

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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ELECTRONIC ENVIRONMENTS CORPORATION,)

Plaintiff )

)

v. )

) **Civil Action No. 05-11093 NG**

)

JAMES M. EMMING, )

Defendant )

)

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**INITIAL DISCLOSURE STATEMENT OF PLAINTIFF  
ELECTRONIC ENVIRONMENTS CORPORATION  
PURSUANT TO FED. R. CIV. P. 26 (a)(1)**

I. Individuals Likely to Have Discoverable Information

- a) Kenneth Rapoport, CEO  
Electronic Environments Corporation  
410 Forest Street  
Marlborough, MA 01752
- b) Michael Kinglsey, President  
Electronic Environments Corporation  
410 Forest Street  
Marlborough, MA 01752
- c) James Peltier  
Electronics Environments Corporation  
410 Forest Street  
Marlborough, MA 01752
- d) Patricia Keville, Project Manager  
Electronic Environments Corporation  
410 Forest Street  
Marlborough, MA 01752
- e) Eugene McNeil, Mid-Atlantic Regional Manager  
Electronic Environments Corporation

410 Forest Street  
Marlborough, MA 01752

- f) James Emming  
114 Vauxhall Street  
New London, CT 06320
- g) Peter Drumm, General Manager  
JT Packard & Associates, Inc.  
275 Investment Court  
Verona, WI 53592

II. Relevant Documents

- a) Non-Competition and Confidentiality Agreement between Electronic Environments Corporation ( EEC ) and James Emming ( Emming ) dated June 7, 1999 in consideration for Emming s continued employment as an at-will employee at EEC;
- b) EEC Employee Handbook;
- c) Documents relating to Emming s employment with JT Packard & Associates ( JT Packard ), including but not limited to, offers of employment, contracts for employment, signing bonuses and incentive agreements and related communications between Emming and JT Packard;
- d) Mutual Confidentiality Agreement between EEC and JT Packard dated May 14, 2004.

III. Damages

Plaintiff seeks injunctive relief. Damages are not ascertainable at this time.

IV. Insurance

No known insurance applicable to Plaintiff s claim.

ELECTRONIC ENVIRONMENTS  
CORPORATION

By its Attorney,

/s/ Leo S. McNamara  
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(617) 723-3344

Dated: September 2, 2005